

**IN THE UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF VIRGINIA  
Richmond Division**

IN RE:	}	
	}	Case No. 19-32259-KLP
Melinda B. Dandridge		
	}	
	}	Chapter 13
	}	
	}	
Debtor		
Address:		9077 Fayemont Drive
		Mechanicsville, Va. 23116
SSN:		xxx-xx-7340

**NOTICE OF MOTION**

Melinda B. Dandridge, (“Debtor”), by counsel, has filed a Motion to Incur Debt, Motion to Expedite and Motion to Shorten Notice Period.

**Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case.**

If you do not want the court to grant the relief sought in the motion, or if you want the court to consider your views on the motion, then on or before you or your attorney must:

- ✓ File with the court, at the address shown below, a written request for a hearing [or a written response pursuant to Local Bankruptcy Rule 9013-1(H)]. If you mail your request for hearing (or response) to the court for filing, you must mail it early enough so the court will receive it on or before the date stated above.

**Clerk of Court  
United States Bankruptcy Court  
701 E. Broad Street, Room 4000  
Richmond, VA 23219**

Massie Law Firm, PC  
Joseph Massie, III, Esquire (Bar No. 35472)  
115 N. 1<sup>st</sup> Street  
Richmond, VA 23219  
(804) 644-4878 (T)  
(804) 644-4874 (F)  
[jmassie@massielawfirm.com](mailto:jmassie@massielawfirm.com)

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You must also mail a copy to:

Joseph Massie, III  
115 N. 1<sup>st</sup> Street  
Richmond, VA 23219-2125

- ✓ **Attend a hearing scheduled for August 28, 2019 at 10 A.M. at Judge Phillips at 701 E. Broad Street, Room 5100, Richmond, VA 23219.**

If you or your attorney do not take these steps, the court may decide that you do not oppose the relief sought in the motion and may enter an order granting that relief.

/s/: Joseph Massie, III  
Joseph Massie, III  
115 N. 1<sup>st</sup> Street  
Richmond, VA 23219-2125  
(804) 644-4878 (T)  
(804) 644-4874 (F)

**CERTIFICATE OF SERVICE**

I hereby certify that pursuant to Local Rule 9022-1, on August 19, 2019, the foregoing **Notice of Motion** has been served on and/or endorsed by all necessary parties.

August 19, 2019

RESPECTFULLY SUBMITTED

Melinda B. Dandridge

By: /s/: Joseph Massie, III  
Joseph Massie, III  
115 N. 1<sup>st</sup> Street  
Richmond, VA 23219-2125  
(804) 644-4878 (T)  
(804) 644-4874 (F)

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Case No. 19-32259-KLP

Chapter 13

**IN THE UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF VIRGINIA  
Richmond Division**

In re: Melinda B. Dandridge

Case Number 19-32259-KLP

Chapter 13

Debtor

**MOTION TO EXPEDITE HEARING**

COMES NOW, Melinda B. Dandridge, the Debtor, by Counsel, and offer the following in support of her **Motion to Expedite Hearing** on the **Motion for Authority to Incur Indebtedness**:

1. On April 29, 2019, Debtor filed in the Honorable Court a petition for relief under Chapter 13 of Bankruptcy Code 11 USC § §1301 **et seq.**
2. Debtor seeks permission to have an Expedited Hearing on the **Motion for Authority to Incur Indebtedness**.
3. That an expedited hearing on the Motions are necessary for the following reason: **Debtors Daughter needs transportation to school.**
4. An expedited hearing is necessary under the circumstances and creditors and parties in interest will not be prejudiced by such expedited hearing being granted.

WHEREFORE, the Debtor respectfully request this Honorable Court to schedule a hearing to be heard on an expedited basis to consider the **Motion for Authority to Incur Indebtedness** and for such other and further relief as the Court deems proper.

August 19, 2019

RESPECTFULLY SUBMITTED,

Melinda B. Dandridge

By:

/s/: Joseph Massie, III

Joseph Massie, III

115 N. 1<sup>st</sup> Street

Richmond, VA 23219-2125

(804) 644-4878 (T)

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Chapter 13

(804) 644-4874 (F)

**IN THE UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF VIRGINIA  
Richmond Division**

In re: Melinda B. Dandridge  
  
Debtor

Case Number 19-32259  
Chapter 13

**CERTIFICATION REGARDING REQUEST FOR EXPEDITED HEARING**

In support of the attached request for an expedited hearing as required by Local Rule 9013-1(N), I hereby certify that:

1. I have carefully examined the matter and concluded that there is a true need for an emergency hearing.
2. I have not created the emergency through any lack of due diligence, and
3. I have made a *bona fide* effort to resolve the matter without hearing.

August 19, 2019

RESPECTFULLY SUBMITTED,  
Melinda B. Dandridge

By: /s/: Joseph Massie, III  
Joseph Massie, III  
115 N. 1<sup>st</sup> Street  
Richmond, VA 23219-2125  
(804) 644-4878 (T)  
(804) 644-4874 (F)

**CERTIFICATE OF SERVICE**

I hereby certify that pursuant to Local Rule 9022-1, on August 19, 2019, the foregoing **Motion to Expedite Hearing** has been served on and/or endorsed by all necessary parties.

August 19, 2019

RESPECTFULLY SUBMITTED

Massie Law Firm, PC  
Joseph Massie, III, Esquire (Bar No. 35472)  
115 N. 1<sup>st</sup> Street  
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Melinda B. Dandridge

By /s/: Joseph Massie, III  
Joseph Massie, III  
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Richmond Division**

In re: Melinda B. Dandridge

Case Number 19-32259-KLP

Chapter 13

Debtor

**MOTION TO SHORTEN NOTICE PERIOD**

COMES NOW, Melinda B. Dandridge, (“the Debtor”), by Counsel, and file this Motion to Shorten the Notice Period for the Motion for Authority to Incur Indebtedness pursuant to 11 USC §364(a) and 1304, Federal Rules of Bankruptcy Procedure 4001(c) and 9013, and Local Bankruptcy Rules 9013-1. In support thereof, Debtor respectfully states the following:

**Jurisdiction**

1. This court has exclusive jurisdiction over this matter pursuant to 28 USC §1334.
2. This proceeding is a core proceeding under 28 USC §157(b)(2)(A)(B)(K) and (O).
3. Venue is proper pursuant to 28 USC §1409.

**Facts**

4. On April 29<sup>th</sup> 2019 the Debtor filed in the Honorable Court a petition for relief under Chapter 13 of Bankruptcy Code 11 USC § §1301 **et seq.**
5. Debtor seeks to shorten the notice period for the **Motion for Authority to Incur Indebtedness** from twenty-one (21) days to eight (8) days.

WHEREFORE, the Debtor prays that this Court enter an Order shortening the notice period for the **Motion for Authority to Incur Indebtedness**

August 19, 2019

RESPECTFULLY SUBMITTED,  
Melinda B. Danridge

Massie Law Firm, PC  
Joseph Massie, III, Esquire (Bar No. 35472)  
115 N. 1<sup>st</sup> Street  
Richmond, VA 23219  
(804) 644-4878 (T)  
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By: /s/: Joseph Massie, III  
Joseph Massie, III  
115 N. 1<sup>st</sup> Street  
Richmond, VA 23219-2125  
(804) 644-4878 (T)  
(804) 644-4874 (F)

**CERTIFICATE OF SERVICE**

I hereby certify that pursuant to Local Rule 9022-1, on August 19, 2019, the foregoing **Motion to Shorten Notice Period** has been served on and/or endorsed by all necessary parties.

August 2, 2019

RESPECTFULLY SUBMITTED  
Melinda B. Dandridge

By /s/: Joseph Massie, III  
Joseph Massie, III  
115 N. 1<sup>st</sup> Street  
Richmond, VA 23219-2125  
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EASTERN DISTRICT OF VIRGINIA  
Richmond Division**

In re: Melinda B. Dandridge

Case Number 19-32259-KLP

Chapter 13

Debtor

**MOTION FOR AUTHORITY TO INCUR INDEBTEDNESS**

COME NOW, the Debtor, Melinda B.Dandridge, by counsel, and in support of her request Motion for Authority to Incur Indebtedness, states as follows:

1. The Debtor is requesting authority to incur indebted with, for the purchase of 2013 Kia Soul or like vehicle in the approximate amount not to exceed **\$5291.00**, and with an interest rate not to exceed **22 %**, **(51 months)** with monthly payments of **\$ 177.50 per month**.
2. Said purchase is necessary as the Debtors Daughter needs transporation for school.
3. Said indebtedness will not impair the Debtor's ability to comply with the terms of Chapter 13 Plan.

WHEREFORE, the Debtor requests an Order authorizing them to incur said indebtedness and for such other relief as the Court may deem appropriate.

August 19, 2019

RESPECTFULLY SUBMITTED,  
Melinda B. Dandridge

By: /s/: Joseph Massie, III  
Joseph Massie, III  
115 N. 1<sup>st</sup> Street  
Richmond, VA 23219-2125  
(804) 644-4878 (T)

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**CERTIFICATE OF SERVICE**

I hereby certify that pursuant to Local Rule 9022-1, on August 19, 2019, the foregoing **Motion for Authority to Incur Indebtedness** has been served on and/or endorsed by all necessary parties.

Acs/navient  
C/o Acs  
Utica, NY 13501

Aes / Wells  
Attn: Bankruptcy  
Po Box 2461  
Harrisburg, PA 17105

AMCA/American Medical Collection Agency  
Attention: Bankruptcy  
4 Westchester Plaza, Suite 110

Elmsford, NY 10523  
AR Resources, Inc.  
Attn: Bankruptcy  
Po Box 1056  
Blue Bell, PA 19422

Bank of America  
4909 Savarese Circle  
F11-908-01-50  
Tampa, FL 33634

BonSecours  
Richmond Health System  
P. O .Box 404893  
Atlanta, GA 30384

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Capital One  
Attn: Bankruptcy  
Po Box 30285  
Salt Lake City, UT 84130

Capital One Auto Finance  
Attn: Bankruptcy  
Po Box 30285  
Salt Lake City, UT 84130

Comcast  
PO Box 173885  
Denver, CO 80217

Comenity Capital/Davids Bridal  
Attn: Bankruptcy Dept  
Po Box 182125  
Columbus, OH 43218

Commonwealth Radiology  
PO Box 4466  
Woodbridge, VA 22194-4466

Consumer Portfolio Service  
P.O. Box 98709  
Phoenix, AZ 85038

Consumer Portfolio Svc  
Attn: Bankruptcy  
Po Box 57071  
Irvine, CA 92619

Credence Resource Management  
17000 Dallas Pkwy Ste 20  
Dallas, TX 75248

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Credit One Bank  
Attn: Bankruptcy Department  
Po Box 98873  
Las Vegas, NV 89193

ERC  
8014 BAYBERRY RD  
Jacksonville, FL 32256

First Premier Bank  
Attn: Bankruptcy  
Po Box 5524  
Sioux Falls, SD 57117

I C System Inc  
Attn: Bankruptcy  
P.O. Box 64378  
St. Paul, MN 55164

I C System Inc  
Attn: Bankruptcy  
Po Box 64378  
St Paul, MN 55164

John P. Fitzgerald, III  
Office of US Trustee Reg 4-R  
701 E. Broad Street, Ste. 4304  
Richmond, VA 23219

Lenoir Rhyne Univ  
625 7th Avenue NE  
Hickory, NC 28601

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LVNV Funding/Resurgent Capital  
Attn: Bankruptcy  
Po Box 10497  
Greenville, SC 29603

Merrick Bank/CardWorks  
Attn: Bankruptcy  
Po Box 9201  
Old Bethpage, NY 11804

Miramed Revenue Group  
Attn: Bankruptcy  
360 East 22nd Street  
Lombard, IL 60148

Montgomery Lynch & Assoc  
P.O. Box 22720  
Beachwood, OH 44122

nhcash.com, LLC  
169 South River Road  
Suite 19  
Bedford, NH 03110

Office of US Trustee  
701 E. Broad Street  
Suite 4300  
Richmond, VA 23219

One Advantage  
P.O. Box 23860  
Belleville, IL 62223

Parrish & lebar, LLP  
5 East Franklin St.  
Richmond, VA 23219

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Red Pine Lending  
16161 Ventura Blvd  
Encino, CA 91436

Rowe Rosen & Fitzhugh  
1001 Boulders Parkway Ste 519  
Richmond, VA 23225

Suzanne Wade  
Chapter 13  
PO Box 1780  
Richmond, VA 23218-1780

US Department of Education/Great Lakes  
Attn: Bankruptcy  
Po Box 7860  
Madison, WI 53707

US Department of Education/Great Lakes  
2401 International Lane  
Madison, WI 53704

Westcreek Fi  
4951 Lake Brook Dr  
Glen Allen, VA 23060

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